



## Equality Impact Assessment

This Equality Impact Assessment considers whether an activity (including policies, procedures, practices, and reviews) may have a positive impact upon protected groups, or may cause discrimination or disadvantage, exclude unjustifiably, discourage or reduce participation, or reduce equal opportunities.

About This EIA Screening	
Activity Title:	Increasing Temporary Accommodation (TA) rents to Local Housing Allowance (LHA) rates
Type of Activity:	<input checked="" type="checkbox"/> Policy / procedure development / review <input type="checkbox"/> Service / function review <input type="checkbox"/> Project <input type="checkbox"/> Organisational change / restructure
Directorate:	Operations
Team:	Housing Management
Person Completing this Form:	Russell Buchanan
Other Staff Involved:	Kieran O'Byrne
Date of Review:	14/12/2018

Activity Information																																											
Who implements and is responsible for this activity?	Stuart Coleman, Head of Housing Management																																										
Briefly describe the aims, objectives, purpose, and intended outcomes of this activity. (consider additional impacts such as health and safety, reputational risk, sustainability,	<p>It is proposed that TA rent in outer London LHA areas are increased from their existing rates to the current LHA rate (subsidy cap would continue to apply for properties in the inner London LHA area and those outside of London). This will raise additional income for the Council's General Fund (GF) account but will not impact on the subsidy.</p> <table border="1"> <thead> <tr> <th></th> <th colspan="3">Outer North London</th> <th colspan="3">Outer North &amp; West London</th> </tr> <tr> <th>Bed size</th> <th>Subsidy Cap</th> <th>New Rent 2019/20</th> <th>% increase</th> <th>Subsidy Cap</th> <th>New Rent 2019/20</th> <th>% Increase</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>£200.97</td> <td>£205.67</td> <td>2.34</td> <td>£195.77</td> <td>£197.12</td> <td>0.69%</td> </tr> <tr> <td>2</td> <td>£247.90</td> <td>£255.34</td> <td>3.00</td> <td>£237.31</td> <td>£249.60</td> <td>5.18%</td> </tr> <tr> <td>3</td> <td>£310.00</td> <td>£315.22</td> <td>1.65</td> <td>£299.61</td> <td>£312.09</td> <td>4.16%</td> </tr> <tr> <td>4</td> <td>£375.00</td> <td>£388.65</td> <td>3.64</td> <td>£361.92</td> <td>£385.63</td> <td>6.55%</td> </tr> </tbody> </table>		Outer North London			Outer North & West London			Bed size	Subsidy Cap	New Rent 2019/20	% increase	Subsidy Cap	New Rent 2019/20	% Increase	1	£200.97	£205.67	2.34	£195.77	£197.12	0.69%	2	£247.90	£255.34	3.00	£237.31	£249.60	5.18%	3	£310.00	£315.22	1.65	£299.61	£312.09	4.16%	4	£375.00	£388.65	3.64	£361.92	£385.63	6.55%
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<i>value for money, and other risk factors.)</i>	5	£375.00	£388.65	3.64	£375.00	£685.63	2.83%
Who will be affected by this activity?	<p>New acquisitions acquired for use as temporary accommodation are already set at the LHA rate, and new homes being delivered on the Council's land will be set at LHA, or subject to affordable rents set at 65% of average private sector market rents whichever is lower.</p> <p>There are 1448 households in temporary accommodation within the borough whose rent will increase because of these changes. Many of the approximately 1000 households in temporary accommodation outside the borough also fall within the outer London LHA area.</p>						

## Equality Impact

Consider whether the evidence shows potential (in relation to each protected characteristic) to:

- Cause or eliminate discrimination
- Reduce or advance equal opportunities
- Impair or foster good relations

Key Questions:

- Are there any barriers which could impact on how different groups might benefit from this activity?
- Does this activity promote the same choices for different groups as everybody else?
- Could any of the following group's experience of this activity be different?
- Does this activity address the needs and potential barriers of these groups?

Protected Characteristic	Known negative / adverse impact?	Additional information (include the source of any evidence and which groups are affected)
<b>Age</b> (children and young people, 0-18 years)	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	Based on rent arrears data, the under 25 age group are substantially more likely to be in arrears and therefore any increase in rent will increase impact on this group.
<b>Age</b> (older people: over 60 years)	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	Over 60s who are in employment and low incomes are more likely to be affected by any increase in rents. Based on overall figures, the people over 60 accounts for 5% of those in TA.
<b>Disability</b> (includes mental and physical impairments)	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	We do not have specific data on disabled people in TA. However, the rent increase isn't believed to have a negative or positive impact.
<b>Gender</b> (including Transgender)	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	60% Of lead tenant in TA are female. As this figure is based on the lead tenant only, it is not known if these households are single or joint tenancies.
<b>Marriage and Civil Partnership</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	We do not have specific data on marriage and civil partnership of those in TA. However, the rent increase is not believed to have a negative or positive impact.
<b>Pregnancy and Maternity</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	We do not have specific data on pregnant women and those on maternity leave in TA. However, the rent increase is not believed to have a negative or positive impact.
<b>Race</b>	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	BAME tenants make up approximately 45% of lead tenants in TA. They also have a disproportionately larger amount of arrears and therefore are more likely to be affected by this policy.
<b>Religion or Belief</b>	<input checked="" type="checkbox"/> No	Christianity is the most prevalent religion

	<input type="checkbox"/> Yes	amongst tenants. However, the rent increase is not believed to have a negative or positive impact.
<b>Sexual Orientation</b> (lesbian, gay and bisexual)	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Lesbian, gay and bisexual tenants make up 1.3% of the tenant group. However, the rent increase is not believed to have a negative or positive impact
<b>Other relevant groups</b> (not covered by the Equality Act 2010) (groups that may experience disadvantage or barriers to access, e.g. single parents, low income families, etc.)	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	Generally, the protected characteristics are not affect. Working tenants on low incomes whose rent will not be fully meet through the benefits system are most likely to affected by any rent increase.  We do not have specific data on the number of households receiving full Housing Benefit. We know that for most tenants housing benefit will continue to cover the costs and will therefore not be affected.
Can the negative / adverse impact(s) be justified on the grounds of promoting equality of opportunity for one group, or any other reason? Please explain.		This will bring in additional revenue for the GF account and enable the Council to continue to deliver services.  This proposal brings the rents on these TA units in line with the new acquisitions purchased and used as TA, and the new properties being developed on Council land
Have any positive impact(s) on any of the protected characteristics been identified? Please briefly explain, providing evidence.		None

**Engagement and involvement** (include who was involved, how and when they were engaged, and the key outcomes)

How have you engaged stakeholders in gathering evidence or testing the evidence available?	There has not been any specific consultation.
How have you engaged stakeholders in testing the policy or proposals?	The commissioning priorities and budget plans for the Housing Committee were included in the Council's budget consultation that took place between 6 December 2017 and 14 January 2018.

## Action Plan

Please give an outline of what broad action you or any other bodies are taking to address any issues identified through the evidence.

Include here any or all of the following, based on your assessment

- Plans already under way or in development to address the issues you have identified.
- Arrangements for continued engagement of stakeholders.
- Arrangements for continued monitoring and evaluating the activity for its impact on different groups as the activity is implemented
- Arrangements you have put in place / need to be in place to communicate the outcome of your analysis.

Issue	Action	Target Date	Responsible